

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe ) Civil Action No.: 6:22-cv-02957-HMH  
4, Jane Doe 5, Jane Doe 6, Jane Doe 7, John )  
Doe 1, John Doe 2, and John )  
and Jane Does 1-100, )

Plaintiffs, )

v. )

Varsity Brands, LLC; Varsity Spirit, LLC; )  
Varsity Brands Holding Company, Inc.; U.S. )  
All Star Federation; USA Federation of Sport )  
Cheering d/b/a USA Cheer; Jeffrey Webb, )  
Charlesbank Capital Partners, LP; Bain )  
Capital, LP; Rockstar Cheer & Dance, Inc., )  
Katherine Anne Foster as the personal )  
representative of the Estate of Scott Foster; )  
Kathy Foster individually, Kenny Feeley, Josh )  
Guyton, Nathan Allan Plank, Christopher )  
Hinton, Tracy a/k/a or f/k/a Traevon Black, )  
Peter Holley, and other Unknown Defendants, )

Defendants. )  
\_\_\_\_\_ )

**PLAINTIFF JOHN DOE 2’S  
ALTERNATIVE DISPUTE  
RESOLUTION (“ADR”) STATEMENT  
AND CERTIFICATION**

Pursuant to Local Civil Rule 16.03, the undersigned certifies that he has (1) provided the Plaintiff John Doe 2 with any materials relating to ADR which were required to be provided by Local Civil Rule 16.01 or order of the Court; (2) discussed the availability of ADR mechanisms with the party; and (3) discussed the advisability and timing of ADR with opposing counsel.

Submitted<sup>1</sup> this 2nd day of August, 2023.

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<sup>1</sup> This statement must be filed and served. Local Rule 16.03, D.S.C. A separate statement and certification is required for each party represented.

**STROM LAW FIRM, LLC**

*s/ Bakari T. Sellers*

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